

# ABRAMS FENSTERMAN

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**MEMO ENDORSED**

**Via Chambers E-Mail**

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Honorable Paul A. Crotty  
Judge, United States District Court  
Southern District of New York  
500 Pearl Street-Chambers 735  
Courtroom 20-C  
New York, NY 10007

*The request is denied*

SO ORDERED: 8-7-12

*Paul A. Crotty*  
HON. PAUL A. CROTTY  
UNITED STATES DISTRICT JUDGE

Re: USA v. Steven Parchment, 11-crim-893  
Modification of Defendant's Bail Conditions-Request to Travel

Dear Judge Crotty:

On behalf of my client Steven Parchment, I respectfully request permission for him to travel to Jamaica as early as possible this week to attend the funeral of his paternal grandmother, Gloria Bent. My client advises me that Mrs. Bent passed away in Jamaica this morning after being hospitalized with a blood clot in her lungs. Mr. Parchment would be staying at the residence of his aunt, Phyllis Hooper, at 5 Blackwood Garden Housing, Old Harbour, St. Catherine, Jamaica, for no more than one week. If granted permission to travel, Mr. Parchment will provide his travel itinerary to Donald Lesmeister, his pretrial services officer in the Southern District of Florida. It is my understanding that because Mr. Parchment's United States passport is being held by Mildred Santana, his former pretrial services officer in the Southern District of New York, she would have to forward the passport to Mr. Lesmeister, or Mr. Parchment would have to come to New York to get it from Ms. Santana. Mr. Parchment will return his U.S. passport to Mr. Lesmeister upon his return from Jamaica.

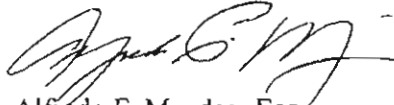
Pursuant to this Court's Rules, I have communicated with Assistant United States Attorney Danya Perry. While sympathetic, she has stated that the Government cannot consent to this request. I have also communicated with Mr. Lesmeister. He is also sympathetic, but his office's position is to defer to the Government and to the pretrial services office in the Southern District of New York.

For the following reasons, we respectfully submit that Mr. Parchment is not a bail risk. Since being released on bond approximately nine months ago, he has made all of his required

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court appearances. It is my understanding that he has been compliant with his pretrial services officers, first in New York and now in Florida. By this Court's permission, he resides in Florida with his wife and two young daughters, who are United States citizens and would not be travelling with him to Jamaica.

Respectfully Submitted,



Alfredo F. Mendez, Esq.

cc: AUSA Danya Perry (via email)  
AUSA Rosemary Nidiry (via email)  
AUSA Martin Bell (via email)  
Donald Lesmeister (via email)  
Mildred Santana (via email)